

EXHIBIT D

1
2
3 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

4 CHAD STANBRO,

PLAINTIFF,

5
6 -against-

Case No.:
19-CV-10857

7
8 WESTCHESTER COUNTY HEALTH CORPORATION,
WESTCHESTER MEDICAL CENTER, FRANK WEBER,
9 AND JOHN FULL,

10 DEFENDANTS.

11 CHAD STANBRO,

PLAINTIFF,

12
13 -against-

Case No.:
19-CV-10857

14
15 C.O. NADYA PALOU, C.O. RAYMOND DEAL, C.O.
KRISTOPHER LEONARDO, C.O. RICHARD LANDRY,
16 CORRECTION NURSE GARY PAGLIARO, AND
CORRECTION SERGEANT ENRIQUE TORRES,

17 DEFENDANTS.

18
19
20 DATE: February 26, 2021
21 TIME: 10:00 A.M.

22 DEPOSITION of the Defendant,
GARY PAGLIARO, taken by the respective
23 parties, pursuant to an Order and to the
Federal Rules of Civil Procedure, held via
24 videoconference, before Victoria Chumas, a
Notary Public of the State of New York.
25

1 G. PAGLIARO

2 adverse effect if they have three people.

3 Q. Now, can you describe for me
4 the medical facility that existed at
5 Fishkill in August of 2018?

6 A. Yes. On the first floor is
7 what we called the clinic. It consisted of
8 a small emergency room, doctor's offices,
9 some nursing offices, for examinations, a
10 small conference room. On the other side
11 is the dental clinic.

12 Q. On the other side of what?

13 A. So as you walk into the
14 building, on your right-hand side would be
15 the emergency room and, down the hallway
16 would be the doctor's offices. On the
17 left-hand side would be the dental.

18 Q. But this would be part of the
19 first floor, correct?

20 A. First floor.

21 Q. Okay. Continue.

22 A. And then, if you walk in the
23 building, instead of making a right toward
24 the clinic, you make a left, that would be
25 what we called the specialty area. That

1 G. PAGLIARO

2 would be where we would hold like
3 cardiology clinic, endocrinology clinic,
4 oncology clinic, so specialists would come
5 from the outside and inmates would come
6 from other jails to see the specialists.
7 That was all on the first floor.

8 Q. And did this first floor have a
9 name?

10 A. The entire building is called
11 the RMU, regional medical unit.

12 Q. So the building is called RMU
13 or just that first floor?

14 A. The whole building.

15 Q. Okay. But the first floor, how
16 would you characterize that? First floor
17 or any other way?

18 A. First floor, usually we
19 separated clinic and specialty.

20 Q. Okay.

21 A. So that is how we would
22 generally differentiate. It's a pretty big
23 floor.

24 Q. Okay. So what else was in the
25 RMU then?

1 G. PAGLIARO

2 A. Okay. So if you went up to the
3 second floor, on one side was the
4 infirmary. That's where patients who were
5 coming back from the hospital stay,
6 patients who had illness stayed, patients
7 who needed isolation for whatever reason
8 stayed, so they had a couple of four
9 bedrooms and a couple of single rooms. On
10 the other side of that, which would be,
11 just to give you an idea, directly above
12 the clinic, would be our long-term care
13 unit, which is more of a nursing home type
14 unit for lack of a better description.
15 Older gentleman needing a little bit more
16 care, needing to be fed and changed, you
17 know, maybe not-all-there. Typical like
18 you would see in a nursing home. And then
19 on the third floor, directly above the
20 long-term care unit is the world's first
21 Alzheimer's, a dedicated Alzheimer's unit
22 for inmates with Alzheimer's.

23 Q. Anything else in the RMU?

24 A. The basement has dialysis.

25 Q. Anything else?

1 G. PAGLIARO

2 A. I mean, store rooms, supplies,
3 stuff like that, you know.

4 Q. Okay. Other than the RMU, were
5 there any portions of Fishkill which
6 constituted any medical facility where any
7 care and treatment was rendered to any
8 prisoners?

9 A. We had a standalone
10 disciplinary unit called S block, and that
11 had a small nursing station in it.

12 Q. Was S block kind of like a SHU,
13 a special housing unit?

14 A. SHU, is a special housing unit.

15 Q. Other than that, have we now
16 talked about all of medical facilities at
17 Fishkill?

18 A. Yes. To the best of my
19 knowledge.

20 Q. Now, you mentioned that in
21 clinic there is a doctor's office, correct?

22 A. Doctor's offices.

23 Q. Offices okay. So there would
24 be physicians on staff at Fishkill?

25 A. Yes. Absolutely.